

REPORT ON CONTRACTOR REQUIREMENTS DOCUMENT

Directive Number and Title: DOE NOTICE 203.1, SOFTWARE QUALITY ASSURANCE

Originating Office: Office of the Chief Information Officer, IM-01

Review Team Members: Kathleen Centeno, SC-65 ; Jim Drake, SPRO

Background

- The Notice was signed by Deputy Secretary Glauthier and issued on October 2, 2000 through the Field Management Council process. The Notice was issued after a review and investigation of several critical reports by the Defense Nuclear Facilities Safety Board, Inspector General, and General Accounting Office on the development and management of DOE software. Several laws were also reviewed including 10 CFR 830 "Nuclear Safety Management", Public Law 104-105 "The Clinger-Cohen Act in the National Defense Appropriations Act of 1996", Public Law 103-62 "Government Performance and Results Act of 1993", and various OMB and OFPP circulars and policy memoranda. The Notice was developed by a small group of Headquarters and field Federal and contractor employees. Before submission to the Field Management Council process, it was reviewed by major program office staffs and the Software Quality Assurance Subcommittee of the Nuclear Weapons Complex. The Notice was also reviewed by the Directives staff who provided guidance on the development of the Contractor Requirements Document. The Field Management Council distributed the Notice throughout the Department for comment before finalization and signature on October 2, 2000.
- The Notice is being revised as an Order through the Directives process and is expected to be issued by the end of February 2002 or shortly thereafter. Comments received during this second Departmentwide review have provided clarifying edits on existing guidance allowing for a uniform interpretation. In addition, remarks furnished by General Counsel have been incorporated into the Notice/Order in order to lessen the burden placed on contractors by clarifying contractor requirements. For example, the change provided by General Counsel to update the language regarding applicability to contractors in paragraph 3.b (N 203.1) and the Contractor Requirements Document now meet new Federal guidelines as opposed to a prior obsolete requirement.

Overview of Requirements

- The Notice/Order establishes DOE policy requirements and provides a framework for the development of a Software Quality Assurance program. Implementation of the program is intended to reduce flaws and errors in DOE software and commensurably to improve mission efficiency and effectiveness. Because of the diversity of missions at the Department, it gives the authority to the Departmental Elements for the specificity and implementation and to provide guidance to their Federal and contractor staffs.

- The Contractor Requirements Document was developed per guidance from Directives. According to Directives, the Order per se applies to Federal staff and the Contractor Requirements Document applies to contractors. The Contractor Requirements Document was developed to contain the basic information for contractor compliance and can be attached to a proposed or existing contract.

Analysis

- DOE N 203.1, Software Quality Assurance, and its Contractor Requirements Document are compliant and in agreement with the Director of Procurement and Assistance Management letter "Performance Based Contracts: Order Review", dated October 16, 2001, specifically paragraph 2, and the Analytical Framework. The Notice is being replaced by DOE O 203.X, Software Quality Assurance, which is expected to be issued by the end of February or shortly thereafter. The Order and its Contractor Requirements Document were also assessed against the guidance disseminated under the DOE Order review and are compliant.
- The Order needs to be applied to any contract dealing with DOE software (e.g., M&O, M&I, etc.) because this software is pervasive throughout the Department and intricate for performing the Department's missions and functions and because most of DOE's software is developed or implemented and managed by contractor staffs. Several OMB and OFPP guidance documents are relevant to software quality assurance as an integral requirement of the Information Technology management advocated by these Offices, including OMB Circular A-130.
- The Notice/Order is streamlined, and has the minimum amount of bureaucratic controls to allow flexibility in implementation and achieve the desired outcome. The Notice/Order and the Contractor Requirements Document were reviewed in accordance with the criteria in the Analytical Framework and are consistent with the criteria.
- The Order and Contractor Requirements Document are being reviewed by both Federal and contractor staffs throughout the Department. No major changes have been received or are expected, as noted above in Background. The Office of Primary Interest (OPI) is awaiting feedback on responses to comments from two remaining organizations.

Summary Recommendations

None.

Minority Views

None.

Originating Office Comments

None.